

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
1:23-cv-01072-JMF**

Evgeny RYZHOV

Plaintiff

-v-

\$5,379,876.94 In United States Currency Formerly
on Deposit in Sunflower Bank, NA et al

Motion for an extension of time

Defendants

_____/

Dear Judge JESSE M. FURMAN:

Pursuant to Fed. R. Civ. P. 4(m), Plaintiff Evgeny Ryzhov moves for entry of an order extending the time within which Plaintiff has to file any motion for default judgment against Defendant Tsargrad Media as ordered by the Court's Order ECF No.61., and states:

1. On February 7, 2023, Plaintiff commenced the above-captioned action against Konstantin Malofeyev and Tsargrad Media, herein collectively referred to as 'Defendants.' This action asserts claims against the Defendants for their involvement in the unlawful divestiture of Plaintiff's assets, which were subsequently laundered through an intricate network of shell companies, investment funds, and foreign bank accounts spanning globally, ultimately culminating in their transfers into the United States. Simultaneously, Defendants were involved in orchestrating and executing a smear campaign aimed at tarnishing the Plaintiff's professional and personal reputation and destroying his international businesses, thereby impeding his capacity to conduct those businesses and generate income. The Defendants' acts have resulted in substantial material and reputational damages to the Plaintiff.

2. As of the current date, Defendant Tsargrad Media has been duly served with the legal proceedings in accordance with the relevant procedural requirements. Despite proper service, Tsargrad Media has neither filed a response nor undertaken any defensive actions in this matter. Consequently, due to this failure to respond or otherwise engage in the defense, the Clerk of Court has entered a default.

3. On January 30, 2024, the Honorable Court entered its Order ECF No.61 directing Plaintiff "to file any motion for default judgment ... within three weeks of the date of this Order," meaning by February 21, 2024.

4. However, the Plaintiff is presently immersed in rigorous preparations for the Bar Examination, which is scheduled for February 27 and 28, 2024. This endeavor demands considerable allocation of time and resources, consequently impeding the Plaintiff's capacity to dedicate the requisite effort towards the preparation of a motion for default judgment and associated documents, including a memorandum of law. The Bar Examination is a critical professional requirement for Plaintiff and is scheduled to occur only twice a year.

5. Granting this extension will not prejudice Defendant Tsargrad Media, as it is a reasonable request given the circumstances and does not suggest any intention on Plaintiff's part to delay the

proceedings unjustifiably. Furthermore, the requested extension is short-term and for a set period, ensuring that the case will proceed in a timely manner following the Plaintiff's Bar Examination.

6. Procedurally, Plaintiff respectfully requests that the time within which he has to file any motion for default judgment be extended to at least thirty - five (35) days, or until March 27, 2024. The additional time will allow Plaintiff to prepare all necessary documents.

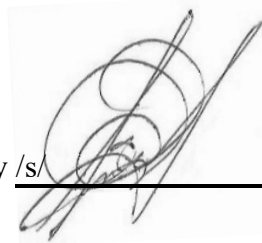
7. This motion is made in good faith and not for the purpose of undue delay.

8. Considering that Defendant Tsargrad Media failed to appear in this action and communicate with Plaintiff by other means, Plaintiff had no opportunity to confer this motion with it.

WHEREFORE, Plaintiff respectfully requests that the time within which he has to file any motion for default judgment be extended or until March 27, 2024. A proposed order is attached for the Court's convenience.

Dated January 31, 2024

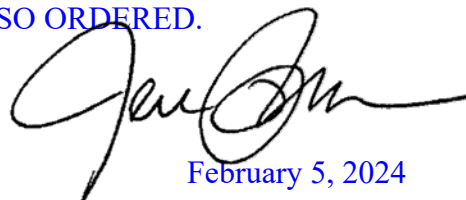
Respectfully submitted

By  _____

Evgeny Ryzhov
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250 174th apt. 1918,
Sunny Isles Beach, FL 33160

Application GRANTED. Plaintiff shall file any motion for default judgment as to Defendant Tsargrad Media no later than **March 27, 2024**. The Clerk of Court is directed to terminate ECF No. 65.

SO ORDERED.


February 5, 2024

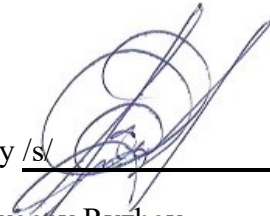
CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January 2024, I electronically filed the foregoing document with the Clerk of the Court. I also certify that true and accurate copies of Plaintiff's Request for Clerk's Certificate of Entry of Default, Affidavit in Support of Request for Entry of Default, and Proposed Entry of Default were served on this day via email upon the Defendant:

TSARGRAD MEDIA,

email: tsargradtv@gmail.com, info@tsargrad.tv, press@tsargrad.tv, reference@tsargrad.tv.

By /s/



Evgeny Ryzhov

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